

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

NATIONAL ELECTRICAL  
ANNUITY PLAN,

Plaintiff,

Case No. 18-13701

v.

Hon. Robert H. Cleland

HENKELS AND MCCOY, INC.,

Defendant

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PLAINTIFF'S PRELIMINARY WITNESS LIST

Plaintiff, through its attorneys, submits the following list of witnesses that it shall, or may, call at trial of the above-captioned matter:

1. Dean Bradley, Business Manager, Local 17, IBEW
2. Jeff Mitchell, Assistant Business Manager, Local 17, IBEW
3. Kevin Shaffer, Former Business manager, Local 17, IBEW

These witnesses will testify to introduce into evidence the relevant collective bargaining agreements, contribution reports and the relevant trust documents and will describe the work performed by the defendant and discuss prior negotiations between the parties.

4. Charles D. Nichols or Kem Whatley, Auditors Stefansky, Holloway & Nichols.

These witnesses will testify regarding their audit of the defendant's wage and other company records;

5. Defendant's agents, employees and/or subcontractors and any other persons who will testify regarding the work they performed for defendant.

6. Keeper of the records of defendant.

7. Keeper of the records of plaintiff fund.

8. All witnesses, including experts, listed in defendant's witness list.

9. All additional witnesses whose identity may become known through discovery.

10 Plaintiff reserves the right to add any and all witnesses as they become known and necessary through the course of this litigation.

Respectfully submitted,

WATKINS, PAWLICK, CALATI, & PRIFTI, PC

BY: George H. Kruszewski

GEORGE H. KRUSZEWSKI (P25857)

Attorney for Plaintiffs

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May 31, 2019

### CERTIFICATE OF SERVICE

I hereby certify that on May 31, 2019, I caused to be electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all attorneys of record.

Respectfully submitted,

WATKINS, PAWLICK, CALATI, & PRIFTI, PC

BY: George H. Kruszewski

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